

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION ----- ETHICON WAVE 2 CASES LISTED IN EXHIBIT A TO DEFENDANTS' MOTION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
--	---

**NOTICE OF ADOPTION OF REPLY IN SUPPORT OF PRIOR DAUBERT MOTION TO
EXCLUDE GENERAL-CAUSATION TESTIMONY OF
DONALD R. OSTERGARD, M.D. FOR WAVE 2**

Defendants hereby adopt and incorporate by reference the Wave 1 Reply in Support of Motion to Exclude General-Causation Testimony of Donald R. Ostergard, M.D., Dkt. 2222. Defendants respectfully request that the Court exclude Dr. Ostergard's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the Wave 2 cases identified in Exhibit A attached to Defendants' Motion.

Respectfully submitted,

ETHICON, INC. AND
JOHNSON & JOHNSON

/s/ Rita A. Maimbourg

Rita A. Maimbourg
TUCKER ELLIS LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113-7213
Telephone: 216.592.5000
rita.maimbourg@tuckerellis.com

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731)
THOMAS COMBS & SPANN PLLC
300 Summers St.
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 25338
Telephone: 304.414.1807
dthomas@tcspllc.com

/s/ Christy D. Jones

Christy D. Jones
BUTLER SNOW LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
Telephone: 601.985.4523
christy.jones@butlersnow.com

CERTIFICATE OF SERVICE

I certify that on August 18, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ Rita A. Maimbourg

Rita A. Maimbourg

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100

Cleveland, OH 44113-7213

Telephone: 216.592.5000

rita.maimbourg@tuckerellis.com